

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the matter of )  
)  
Inquiry Regarding Carrier Current ) ET Docket No. 03-104  
Systems, including Broadband over )  
Powerline Systems )

To: The Commission

**REPLY COMMENTS OF  
W. J. J. HOGE  
TO THE COMMENTS OF AMEREN ENERGY COMMUNICATIONS, INC.;  
AMPERION, INC.; PPL TELCOM, LLC; AND PROGRESS ENERGY, INC.**

By: W. J. J. Hoge  
20 Ridge Road  
Westminster, Maryland 21157

1. I am a licensed Amateur Radio Operator. My call sign is W3JJH. I received a Bachelor of Engineering degree in Electrical Engineering from Vanderbilt University in 1970. I have been employed in engineering design and management in the broadcast and satellite communications industries and in other areas related to electromagnetic compatibility and interference for over 30 years.
2. I wish to bring to the Commission's attention that none of the comments filed by any of the above mentioned companies contain any real world data in support of the claims that the BPL systems they propose can operate without causing detrimental interferences to licensed services, nor do they present any data to show that they are reasonably immune to interference from licensed transmitters. One can find statements that they "believe that BPL does not pose significant risks for unintended high frequency radiation that will impair the operation ..." of other service. But no data.
3. The present Part 15 levels assume a point source of noise. BPL lines are large, distributed, and efficient radiators. A reduction from  $30 \mu\text{V/m}$  @ 30 m to  $300 \text{ nV/m}$  for the HF range would be a drastic reduction from the current requirement but would still result in a significant increase in electromagnetic smog.

4. My amateur station is capable of transmitting at an effective radiated power of over 10 kW from a antenna less than 30 m from the power lines found of three sides of my property. Other amateur stations operating well within the limits of the Commission's Rules are even more powerful. Operating under Part 15, a BPL system would not be protected from the interference that would certainly come from my licensed station. However, I wouldn't want to have to explain the situation to an irate neighbor.

5. The Commission's goal of improved and expanded Broadband Internet access is definitely in the public interest. However, allowing BPL to cripple existing over-the-air services is not.

Dated: 18 August, 2003